

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

BRITTANY BURGO

Plaintiff,

vs.

AIRPORT TERMINAL SERVICES,  
INC.

Defendant.

Case No. 19-cv-11627

Hon. Judith E. Levy

Magistrate Judge Stephanie Dawkins Davis

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**DEFENDANT'S PRELIMINARY LAY WITNESS LIST**

Defendant, Airport Terminal Services, Inc. ("Defendant"), by and through its attorneys, Ogletree, Deakins, Nash, Smoak & Stewart, PLLC, submits the following as its Preliminary Witness List:

1. Plaintiff, Britany Burgo
2. The following are current or former employees of Defendant who may be contacted through counsel:

- a. Deborah Gokhan
- b. Debroah Lis
- c. Elizabeth O'Harris
- d. Randy Patterson
- e. Melody Maten
- f. Kyle Blankenship
- g. Tammy FaForke
- h. Jeff Luetkenhaus
- i. Edward Harris
- j. Lathoya Washington
- k. Aaron Williams

3. All current and former agents, employees and/or contractors of Defendant with knowledge of Plaintiff's work performance and/or facts related to allegations in Plaintiff's Complaint.

4. All attending, treating and/or examining physicians, psychiatrists, psychologists, therapists, and health care professionals of Plaintiff.

5. Records Custodians for all attending, treating and/or examining physicians, psychologists, therapists, and health care professionals of Plaintiff.

6. Any other expert or other witnesses whose testimony becomes known and/or Defendant deems relevant through further discovery.

7. All Records Custodians for any employment, medical, court, or EEOC documents obtained by Defendant through discovery, subpoena, or otherwise.

8. As discovery has not yet begun, all witnesses identified in depositions, interrogatory responses, and responses to requests for production of documents or third-party subpoenas/FOIA requests in this matter.

9. All witnesses with information relating to any income received by Plaintiff and/or Plaintiff's efforts to mitigate any alleged damages.

10. All witnesses who become known through the course of discovery.

11. All witnesses necessary for foundation purposes in the entry of exhibits.

12. All persons identified in exhibits used at deposition or in exhibits attached to any motion filed in this matter.

13. All experts needed to respond to experts named by Plaintiff.

14. Any necessary rebuttal or surrebuttal witnesses.

15. Any and all records custodians, as necessary.

16. All persons identified on Plaintiff's Witness List, whether or not called to testify.

Defendant reserves the right to amend this Witness List based on further discovery.

Respectfully submitted,

s/Martin C. Brook  
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Dated: November 8, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on November 8, 2019, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will send notification of such filing to all ECF participants.

s/ Martin C. Brook  
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